RMP Program Level 1 Process Checklist **Facility Name:** _____

Section A-Process Program Level Applicability [40 CFR 68.10]

1.	For the past five years prior to the submission of a RMP, the Program 1 process(es) has not had an accidental release resulting in offsite: death, injury, or response or restoration activities for an exposure of an environmental receptor? [68.10(b)(1)]	☐Y	☐N	☐N/A
2.	Is nearest public receptor beyond the distance to the toxic or flammable endpoint as defined in 40 CFR 68.22(a) for the Program 1 process(es)? [68.10(b)(2)]	☐Y	☐N	☐N/A
3.	Have emergency response procedures been coordinated between the stationary source and local emergency planning and response organization? [68.10(b)(2)]	☐Y	☐N	☐N/A

Section B-Hazard Assessment-Worst-Case Scenario [40 CFR 68.25]

1.	Has the owner or operator determined the worst-case release quantity to be the greater of the following: [68.25(b)] ☐ If released from a vessel, the greatest amount held in a single vessel, taking into account administrative controls that limit the maximum quantity? [68.25(b)(1)] ☐ If released from a pipe, the greatest amount held in the pipe, taking into account administrative controls that limit the maximum quantity? [68.25(b)(2)]	☐Y	☐N	☐N/A
2.a.	Has the owner or operator for <u>toxic substances</u> that are <u>normally gases</u> at <u>ambient temperature and handled as a gas or liquid under pressure</u> :			
2.a.(1)	Assumed the total quantity in the vessel or pipe would be released as a gas over 10 minutes? [68.25(c)(1)]	☐Y	☐N	☐N/A
2.a.(2)	Assumed that, in the absence of passive mitigation systems, the release rate would be the total quantity divided by 10? [68.25(c)(1)]	☐Y	☐N	☐N/A
2.b	Has the owner or operator for <u>toxic gases</u> that are handled as <u>refrigerated liquids at ambient pressure</u>:			
2.b.(1)	Assumed the substance, if not contained by a passive mitigation system or if the contained pool would have a depth of 1 cm or less, would be released as a gas in 10 minutes? [68.25(c)(2)(i)]	☐Y	☐N	☐N/A
2.b.(2)	[Optional for owner or operator] If a passive mitigation system will result in the being contained in a pool with a depth greater than 1 cm, has the owner or operator elected to treat the as a liquid pool? [68.25(c)(2)(ii)]	☐Y	☐N	☐N/A
2.b.(3)	If the owner or operator is treating the release as a liquid pool, has it calculated the volatilization rate at the boiling point of the substance and at the conditions specified in 68.25(d)? [68.25(c)(2)(ii)]	☐Y	☐N	☐N/A
2.c.	Has the owner or operator for <u>toxic substances</u> that are <u>normally liquids at ambient temperature</u>:			
2.c.(1)	Assumed the quantity in the vessel or pipe would be spilled instantaneously to form a liquid pool? [68.25(d)(1)]	☐Y	☐N	☐N/A
2.c.(2)	Where there is no passive mitigation system, has the owner or operator determined the surface area of the pool by assuming that the liquid spreads to 1 cm deep, or if passive mitigation is in place, used the actual surface area of the contained liquid to calculate the volatilization rate? [68.25(d)(1)(i)]	☐Y	☐N	☐N/A
2.c.(3)	Taken into account the actual surface characteristics, if the release would occur onto a surface that is not paved or smooth? [68.25(d)(1)(ii)]	☐Y	☐N	☐N/A
2.c.(4)	Determined the volatilization rate by accounting for the highest daily maximum temperature in the past three years, the temperature of the substance in the vessel, and the concentration of the substance if the liquid spilled is a mixture or solution? [68.25(d)(2)]	☐Y	☐N	☐N/A
2.c.(5)	Determined the rate of release to air from the volatilization rate of the liquid pool? [68.25(d)(3)]	☐Y	☐N	☐N/A
2.c.(6)	Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(d)(3)]	☐Y	☐N	☐N/A

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2.d.	Has the owner or operator for flammables:			
2.d.(1)	Assumed the quantity in a vessel(s) of flammable gas held as a gas or liquid under pressure or refrigerated gas released to an undiked area vaporizes resulting in a vapor cloud explosion? [68.25(e)]	☐Y	☐N	☐N/A
2.d.(2)	For refrigerated gas released to a contained area or liquids released below their atmospheric boiling point, assumed the quantity volatilized in 10 minutes results in a vapor cloud? [68.25(f)]	☐Y	☐N	☐N/A
2.d.(3)	Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(e)]	☐Y	☐N	☐N/A
3.	Used the parameters defined in 68.22 to determine distance to the endpoints? [68.25(g)]	☐Y	☐N	☐N/A
4.	Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(g)] What modeling technique did the owner or operator use? [68.25(g)] _____	☐Y	☐N	☐N/A
5.	Ensured that the passive mitigation system, if considered, is capable of withstanding the release event triggering the scenario and will still function as intended? [68.25(h)]	☐Y	☐N	☐N/A
6.	Considered also the following factors in selecting the worst-case release scenarios: [68.25(i)] ☐ Smaller quantities handled at higher process temperature or pressure? [68.25(i)(1)] ☐ Proximity to the boundary of the stationary source? [68.25(i)(2)]	☐Y	☐N	☐N/A

Section C – Risk Management Plan [40 CFR 68.190 – 68.195]

1.	Does the single registration form include, for each covered process, the name and CAS number of each regulated substance held above the threshold quantity in the process, the maximum quantity of each regulated substance or mixture in the process (in pounds) to two significant digits, the five- or six-digit NAICS code that most closely corresponds to the process and the Program level of the process? [68.160(b)(7)]	☐Y	☐N	☐N/A
2.	Has the owner or operator reviewed and updated the RMP and submitted it to EPA [68.190(a)]? Reason for update: ☐ Five-year update. [68.190(b)(1)] ☐ Within three years of a newly regulated substance listing. [68.190(b)(2)] ☐ At the time a new regulated substance is first present in an already regulated process above threshold quantities. [68.190(b)(3)] ☐ At the time a regulated substance is first present in a new process above threshold quantities. [68.190(b)(4)] ☐ Within six months of a change requiring revised PHA or hazard review. [68.190(b)(5)] ☐ Within six months of a change requiring a revised OCA as provided in 68.36. [68.190(b)(6)] ☐ Within six months of a change that alters the Program level that applies to any covered process. [68.190(b)(7)]	☐Y	☐N	☐N/A
3.	If the owner or operator experienced an accidental release that met the five-year accident history reporting criteria (as described at 68.42) subsequent to April 9, 2004, did the owner or operator submit the information required at 68.168, 68.170(j) and 68.175(l) within six months of the release or by the time the RMP was updated as required at 68.190, whichever is earlier.	☐Y	☐N	☐N/A
4.	If the emergency contact information required at 68.160(b)(6) has changed since June 21, 2004, did the owner or operator submit corrected information within thirty days of the change?	☐Y	☐N	☐N/A